

REMARKS

In the Final Office Action, the Examiner rejected claims 1, 2, 4-13, 16, and 18 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0046028 to Saito ("*Saito*") in view of U.S. Patent Application Publication No. 2002/0152219 to Singh ("*Singh*"), and rejected claims 14 and 15 under 35 U.S.C. § 103(a) as being unpatentable over *Saito* and *Singh* in view of U.S. Patent Publication No. 2005/0154690 to Nitta et al. ("*Nitta*").

By this Amendment, Applicant amends claims 1 and 18. Claims 1, 2, 4-16, and 18 are pending.

I. The Rejection of Claims 1, 2, 4-13, 16, and 18 under 35 U.S.C. § 102(b)

Applicant respectfully traverses the rejection of claims 1, 2, 4-13, 16, and 18 under 35 U.S.C. § 103(e) as being unpatentable over *Saito* in view of *Singh*.

Independent claim 1 recites an apparatus for updating a hierarchical classification dictionary comprising, among other things, "an approximate proposal extracting unit that extracts one of the previously received proposals stored by the proposal history storing unit that approximates a latest received proposal, the extracted proposal being extracted by searching the previously received proposals using a search technique to determine that the extracted proposal approximates the latest received proposal, wherein the search technique used to extract the previously received proposal uses a first mathematical formula when the latest received proposal is a proposal to edit the hierarchical classification dictionary and uses a second mathematical formula when the latest received proposal is a proposal to add to the hierarchical classification

dictionary, the second mathematical formula being different than the first mathematical formula" (emphasis added).

Saito discloses extracting reference speech information from a plurality of speech recognition dictionaries in a hierarchical structure, to compare between reference speech information and input speech (*Saito*, abstract). *Saito* also discloses calculating the sum of the number of pieces of reference speech information in location name dictionaries (*Saito*, ¶ 85). However, the Office Action concedes that *Saito* does not disclose "an approximate proposal extracting unit that extracts one of the past received proposals ... that approximates a latest received proposal ... by searching the past received proposals using a search technique" (Office Action at page 4). Accordingly, *Saito* also does not teach or suggest "an approximate proposal extracting unit that extracts one of the previously received proposals ... by searching the previously received proposals using a search technique ... wherein the search technique used to extract the previously received proposal uses a first mathematical formula when the latest received proposal is a proposal to edit the hierarchical classification dictionary and uses a second mathematical formula when the latest received proposal is a proposal to add to the hierarchical classification dictionary, the second mathematical formula being different than the first mathematical formula," as recited by independent claim 1 (emphasis added).

Singh fails to cure any of the above-noted deficiencies of *Saito*. *Singh* discloses a method of compression, storage, and transmission of text written in natural languages comprised of a finite vocabulary of words, phrases, sentences, etc. (*Singh*, abstract). *Singh's* method uses a hierarchy of dictionaries that are dynamically created, and may

contain subdictionaries specific to languages or subject areas of the text (*Singh*, abstract). For example, *Singh* discloses parsing words or data sequences from text, and comparing the parsed words or data sequences to the dynamically compiled hierarchical dictionaries (*Singh*, ¶ 17). When the parsed words are not present in the predetermined dictionary, *Singh*'s method creates at least one supplemental dictionary including the parsed words that are not present in the predetermined dictionary (*Singh*, ¶ 17).

The Office Action alleges that *Singh*'s disclosure of creating a supplemental dictionary corresponds to a "search technique" (Office Action at pages 4-5). However, even assuming the Office Action is correct (a position Applicant does not concede), *Singh* still does not teach or suggest that a mathematical formula is applied to create the supplemental dictionary. Accordingly, *Singh* does not teach or suggest "an approximate proposal extracting unit that extracts one of the previously received proposals ... by searching the previously received proposals using a search technique ... wherein the search technique used to extract the previously received proposal uses a first mathematical formula when the latest received proposal is a proposal to edit the hierarchical classification dictionary and uses a second mathematical formula when the latest received proposal is a proposal to add to the hierarchical classification dictionary, the second mathematical formula being different than the first mathematical formula," as recited by independent claim 1 (emphasis added).

Accordingly, *Saito* and *Singh*, alone or in combination, do not render obvious independent claim 1, and no prima facie case of obviousness has been established. Independent claim 18, although of different scope, is allowable at least for similar

reasons as discussed above with respect to claim 1. Claims 2, 4-13, and 16 are allowable at least due to their dependence from independent claim 1. Applicant therefore respectfully requests the Examiner to withdraw the rejection of claims 1, 2, 4-13, 16, and 18 under 35 U.S.C. § 103(a) as being unpatentable over *Saito* in view of *Singh*, and allow these claims.

II. The Rejection of Claims 14 and 15 under 35 U.S.C. § 103(a)

Applicant respectfully traverses the rejection of claims 14 and 15 under 35 U.S.C. § 103(a). Claims 14 and 15 depend from claim 1. As already discussed, *Saito* and *Singh*, alone or in combination, fail to teach or suggest certain features of independent claim 1.

Nitta discloses syntactically analyzing a textual document and constructing knowledge from one or more words (*Nitta*, abstract). *Nitta* further discloses marking the knowledge, and forming a knowledge structure, such as a graph, from the constructed knowledge (*Nitta*, abstract). However, *Nitta* does not teach or suggest “an approximate proposal extracting unit that extracts one of the previously received proposals ... by searching the previously received proposals using a search technique ... wherein the search technique used to extract the previously received proposal uses a first mathematical formula when the latest received proposal is a proposal to edit the hierarchical classification dictionary and uses a second mathematical formula when the latest received proposal is a proposal to add to the hierarchical classification dictionary, the second mathematical formula being different than the first mathematical formula,” as recited by independent claim 1 (emphasis added).

For at least the reasons discussed above, claims 14 and 15 allowable over the cited references, at least due to its dependence from allowable base claim 1.

III. Conclusion

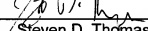
In view of the foregoing amendments and remarks, Applicant respectfully requests reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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